

U.S. Department of Justice

United States Attorney Eastern District of New York

JAM/MEM F. #2017R00509 271 Cadman Plaza East Brooklyn, New York 11201

August 9, 2021

By Email and ECF

Mark DeMarco, Esq. *msdlaw@aol.com*

Michael O. Hueston, Esq. *mhueston@nyc.rr.com*

John A. Diaz, Esq. johnadiazlaw@gmail.com

Monica Nejathaim, Esq. *mnejathaim@fischettilaw.com*

Susan G. Kellman, Esq. sgk@kellmanesq.com

Kenneth J. Montgomery, Esq. ken@kjmontgomerylaw.com

Ezra Spilke, Esq. ezra@spilkelaw.com

Jacqueline E. Cistaro, Esq. jec@cistarolawfirm.com

Re: United States v. Karl Jordan, Jr., et al. Criminal Docket No. 20-305 (LDH)

Dear Counsel:

Enclosed please find the government's supplemental discovery production for defendants Karl Jordan, Jr. and Ronald Washington in accordance with Rule 16 of the Federal Rules of Criminal Procedure, items Bates numbered 1150 through 1293. These materials include search warrant affidavits; latent print reports; narcotics laboratory reports and invoices; and additional disclosures. Items Bates numbered 1150-1246 and 1271-1292

have been marked "sensitive" under the terms of the Stipulation and Protective Order issued on September 17, 2020.

Also enclosed is an index of the discovery. The index will not be filed electronically. As with all discovery materials provided by the government that contain personal identifying information regarding specific individuals and uncharged third parties, any filings pertaining to discovery materials must comply with Rule 49.1(a) and other applicable law.

The government also reiterates its request for reciprocal discovery from the defendants, including notice of any alibi defense pursuant to Fed. R. Crim. P. 12.1(a). To date, neither defendant has provided notice of any alibi or reciprocal discovery materials.

Very truly yours,

JACQUELYN M. KASULIS Acting United States Attorney

By: /s/ Artie McConnell
Artie McConnell
Mark E. Misorek

Assistant U.S. Attorneys (718) 254-7000

cc: Clerk of the Court (LDH) (by ECF) (without enclosures)